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8 **UNITED STATES BANKRUPTCY COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

10 IN RE:

11 **TEMBLOR PETROLEUM COMPANY, LLC.**

12 **DEBTOR.**

Bankruptcy Case No.: 2020-11367

Chapter 7

DMG-6

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15 **MOTION TO FURTHER EXTEND DEADLINE TO ASSUME**
16 **EXECUTORY CONTRACTS AND LEASES**

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18 TO THE HONORABLE JENNIFER E. NIEMANN, UNITED STATES
19 BANKRUPTCY JUDGE:

Chapter 7 Trustee Jeffrey Vetter ("Trustee") represents as follows:

20 1. Debtor filed a voluntary petition under Chapter 11 of the United States Bankruptcy
21 Code on April 9, 2020. This case converted to Chapter 7 on May 5, 2021. Jeffrey M. Vetter is
22 the acting Chapter 7 Trustee in this case.

23 2. Among the assets of the estate are the Debtor's non-operator interests in various oil
24 and gas leases that are attached as exhibits to Debtor's Schedule "G" and that are associated
25 with what the Debtor describes as the "Witter Field Project". A true and correct copy of

26 FURTHER MOTION TO EXTEND DEADLINE TO ASSUME OR REJECT EXECUTORY CONTRACTS AND

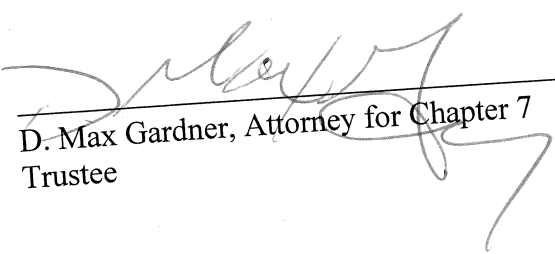
27 LEASES

1 Debtor's Schedule "G" with exhibits is filed concurrently with this Motion as Exhibit "A".
2 There is continued interest in the acquisition of these assets expressed to the Trustee and
3 request by parties in interest that the deadline be extended. The Trustee has interviewed
4 representatives of the Debtor and representatives of the entity that was hired while this case
5 was in Chapter 11 and has come to a determination that the Chapter 7 estate should continue to
6 pursue attempting to sell this asset. The value and ability to sell these assets is not yet
7 determined by the Trustee. There are also operator expenses involved in these assets that may
8 make the sale difficult. However, the Trustee, out of caution seeks to preserve the rights the
9 Chapter 7 estate may have in these interests by again extending the deadline with which these
10 interests may be determined to be assumed or rejected under 11 U.S.C. Section 365(d)(1). By
11 this motion, the Trustee requests that the deadline be extended 90 days from the date set for
12 hearing in this matter.

13 3. Cause exists for granting this Motion and extending the deadline on the basis that the
14 Trustee believes the status quo with regard to the Debtor's interests in these executory contracts
15 should be maintained pending his investigation into the assets and liabilities of the estate and the
16 attempted marketing of these interests. The Trustee believes that no harm or interest will occur
17 to other parties to the executory contracts by the granting of this motion. 11 U.S.C. Section
18 365(d)(2) allows the Court to extend the deadline.

19 WHEREFORE, Trustee moves the Court for an order extending the deadline to assume
20 and/or reject executory contracts as described herein for a period of 90 days from the date of
21 hearing and for such other and further relief appropriate under the circumstances of this case.

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23 Dated: February 7, 2021


D. Max Gardner, Attorney for Chapter 7
Trustee

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26 FURTHER MOTION TO EXTEND DEADLINE TO ASSUME OR REJECT EXECUTORY CONTRACTS AND
27 LEASES